

Appendix B

Hanford Advisory Board Advice and Public Comment for End States

To: Mike Thompson

From: Todd Martin

Date: 18 October 2003

Re: HAB advice pertaining to Risk Based End States

Mike, below are some select passages from HAB advice that bear on the RBES discussion. This quick summary comes with a couple of caveats.

First, it is always a bit dicey to take any individual comment out of the context of its original piece of advice. As a result, these are reference points for you on how the Board might lean on any particular issue as opposed to hard, fast stances.

Second, this doesn't represent an exhaustive review of HAB advice and adopted products (such as the Future Site Uses Working Group Final Report). Rather, this is a quick review of input the Board has provided over the last couple years on these topics.

I hope this is useful and don't hesitate to contact me if you have questions (250/362-5629 or toddmartin@telus.net).

Advice #125:

“Groundwater remains of foremost concern to the Board. The Board encourages the agencies to maintain ongoing successful groundwater remediation actions and pursue more aggressive technology development and treatment activities.”

Board advised that 300 Area cleanup should be comprehensive (e.g. include all facilities and waste sites).

“The Board also recommends DOE's approach to cleanup priorities in the 300 Area be based on risks to workers, the public and the environment with appropriate consideration to infrastructure and mortgage reduction issues.”

“Consistent with past Board advice, the cleanup goal ‘outside the 300 Area fence’ should be unrestricted use.” The Tri-Party Agreement agencies response to this was essentially, ‘it will remain industrial.’ This is an example of where the RBES process may bring the 300 Area cleanup closer to HAB values.

Advice #128:

“The Board advises that a comprehensive risk assessment, including quantitative analyses be developed to guide cleanup decisions.”

Advice #129:

“Any decision to relax current standards to accelerate cleanup and reduce costs must be supported by credible risk assessments, for example, leaving waste in tanks, reclassifying wastes, and possible increases in soil disposal.”

Advice #131:

“Currently the Board defines compliance with the Tri Party Agreement (TPA) and its processes as the blueprint for responsible cleanup.”

This advice also identified a sort of variance analysis saying that the PMP should, “identify acceleration proposals not in compliance with current orders, rules and laws, or in keeping with the TPA.”

Advice #132:

“The Board acknowledges that some waste will remain in the core zone when this cleanup effort is complete. However, the core zone should be as small as possible and should not include contaminated areas outside the 200 Area fences. The waste within the core zone should be stored and managed to make it inaccessible to inadvertent intruding humans and animals.”

“A continued human presence in the core zone would provide an ongoing, active institutional interest vested in future management of the risks posed by Hanford waste. One way to ensure this continuous human presence is to maximize the potential for any beneficial use of the accessible areas of the core zone, rather than rely only on long-term government control of these areas.”

“Groundwater is a valuable resource with beneficial future uses that must not be restricted outside of the individual waste management unit points of compliance within the core zone.”

“For the Central Plateau, the Board advises the agencies to analyze a range of potential human health and ecological risks, including the reasonable maximum risk expected over time. The stakeholder community will use this analysis to advise the agencies on appropriate cleanup decisions. The risk analysis should include: a reasonable maximum exposure to a resident and/or Native American, including groundwater use, in what is currently labeled the buffer zone and in areas freed up for use as the core zone shrinks. For the waste management areas within the core zone, exposure scenarios should include a reasonable maximum exposure to a worker/day user, to possible Native American users, and to intruders.”

Advice #135:

“Consistent with its previous advice on risk assessment and exposure scenarios, the Board recommends that a spectrum of analyses and scenarios be run to include tribal use, recreational and rural residential uses in the river corridor. The agencies should consider tribal and recreational use scenarios for all lands within at least one-quarter mile from the river shoreline. In the upland areas of the river corridor, tribal, recreational and rural residential scenarios should be used. Results of risk analyses and exposure scenarios need to be communicated with the public prior to making any decisions based on these efforts.”

“Groundwater in the river corridor should be remediated to meet drinking water and ambient water quality standards by the time DOE petitions the EPA to remove the river corridor from the National Priorities List.”

Advice #145:

“Activities must do no further harm to groundwater and groundwater should be cleaned up to its highest beneficial use. The Department of Energy’s Hanford site Groundwater Strategy and Groundwater Implementation Plan, and all DOE plans, strategies and actions should reflect that goal.”